UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

NOV 0 3 2016

Via Electronic Mail

Mr. Patrick Durham
Director
Environmental, Safety, & Real Estate Services
Sacramento Municipal Utility District
6201 S Street, Mail Stop H201
Sacramento, CA 95817

Re: Polychlorinates Biphenyl Notification and Remedial Plan SMUD Headquarters 6201 S. Street Sacramento, California.

Dear Mr. Patrick Durham,

Thank you for working with the U.S. Environmental Protection Agency Region 9 (USEPA) to address the cleanup of polychlorinated biphenyls (PCB) found at Sacramento Municipal Utility Districts (SMUD) office headquarters building located at 6201 S Street Sacramento, California (site). USEPA has received and reviewed SMUDs September 28, 2016 *Polychlorinated Biphenyls Notification and Remedial Plan SMUD Headquarters 6021 S Street Sacramento, California* (work plan) prepared by Kleinfelder. Based on the complexity of the site, SMUD has proposed a PCB cleanup under 40 CFR 761.61(c). USEPA is approving with conditions, SMUDs work plan under 40 CFR 761.61(c). This approval applies **only** to PCB remediation waste and does not apply to PCB bulk product. SMUD shall implement its work plan as modified by the conditions in Section A.

SMUD headquarters is a six story building (including basement) that was built between 1959 and 1960, it is approximately 130,000-square-foot, and is listed on the National Register of Historic Places. The building is located in a mix use zone with light commercial and residential properties. SMUD will be renovating their headquarters, and as a component of pre-renovation, a hazardous material assessment was conducted between August 2014 and April 2016. PCBs were identified in the soils, dirt and storm drains that surround the perimeter of the building with concentrations less than 50 ppm. Building materials such as: (1) sealants, (2) mastic, (3) the substrates to sealants/mastics, (4) HVAC system, (5) fire proofing insulation, and (6) ceiling tiles were all identified to either be contaminated by PCBs, or manufactured with PCBs (i.e. Bulk Product Waste). The mastic, and all the sealants, with the exception of the sealants used between the concrete aggregate panels on the exterior of the building have been found to be PCB bulk product waste. SMUD had previously replaced the sealants between the aggregate panels. SMUD and USEPA believe that the sealants currently installed between the aggregate panels were contaminated by PCBs left from the original sealant (PCB Bulk Product) used on site. The substrates to sealants and mastics, sealant used between concrete aggregate panels, the aggregate, the HVAC system, fireproofing material, ceiling tiles, and soils and sediments are considered

PCB remediation waste. The PCB remediation shall be disposed of, left in place or decontaminated.

SMUDs workplan describes the remedial efforts to take place including the separation and disposal of PCB Remediation waste and PCB Bulk Product waste. SMUD has conducted a risk evaluation for leaving PCB remediation waste in place namely the contaminated sealants and aggregate panels that are on the exterior of the building. USEPA concurs with SMUDs conclusions that the PCBs left in place do not pose an unreasonable risk to human health or the environment. SMUD has also conducted a pilot study to test efficacy of floor mastic removal and consequent decontamination of porous substrates throughout the building (i.e. concrete flooring previously covered with tile/carpet tile). SMUDs pilot study concluded that decontamination of the porous substrate could not meet residential, nor commercial/industrial remediation goals and SMUD has decided to "cap" the concrete by encapsulating the surface using a two part epoxy coating. SMUDs workplan continues to describe the cleaning of the storm water drain system. SMUD sampling results indicated elevated levels up to 2.3 ppb (µ/L) total PCBs in the Storm water system surrounding SMUDs headquarters. Although the PCB results are $\leq$ 3 ppb (µ/L) per TSCA 40 CFR 761.79(b)(1)(ii), SMUD will perform a flush and cleaning of the storm water drainage system.

SMUD workplan describes decontamination efforts to take place on the non-porous surfaces (i.e. non-porous metal framing for windows) after the removal of the PCB contaminated sealants. SMUD proposes to decontaminate the non-porous metal surfaces to a NACE standard and $\leq 5\mu g/100cm^2$ total PCBs using wipe samples. SMUD has proposed a remediation goal of 0.24ppm total PCBs for all soils, dust, and dirt surrounding SMUDs headquarters.

A. USEPA Conditions of Approval

1. **Verification Sampling and Analysis Plan.** SMUD has USEPA approval in regards to cleanup levels and goals, however SMUD has yet to describe where and how Confirmation sampling will take place for non-porous materials, and the areas in soil surrounding the headquarters building that have not been delineated to the cleanup goal of .24ppm total PCBs. Therefore, SMUD shall submit a Verification Sampling and analysis plan (SAP) addressing all applicable PCB remediation soils, sediment and debris, and all non-porous surfaces. The Verification SAP shall include, but is not limited to (1) methods used for sample extraction and analysis; (2) USEPA approved cleanup levels and actions, (3) figures depicting the locations of cleanup verification samples, and (4) the level of quality assurance reporting guidelines that will be used by SMUDs contracted laboratory. SMUD must submit the Verification SAP for USEPA approval; however, the preparation and submittal of the Verification SAP should not prevent SMUD from beginning to implement their approved work plan.

2. **Restrictive Land Use Covenant.** SUMD is applying a two part epoxy coating on the porous surfaces inside SMUDs headquarters as a cap. Due to PCBs being left in place under this cap the USEPA is requiring a Restrictive Land Use Covenant (LUC) be recorded in accordance with California state law. The LUC must be submitted to USEPA for review and approval

within 60 days after USEPA's approval of Cleanup Completion Report. At a minimum, the LUC must contain the following:

a. SMUDs Polychlorinated Biphenyl Notification and Removal Plan prepared by Kleinfelder September 28, 2016
b. The USEPA conditional approval dated October __, 2016 and any amendment(s) to that approval.
c. The information required in 40 CFR 761.61(a)(8)(i)(1),(2), and (3)
d. Figures depicting location and concentrations of **all** known PCBs remaining at the site.
e. The location, type and detailed description of the encapsulate (cap).
f. A copy of SMUDS Operations and Maintenance Plan for the cap and post-cleanup activities.
g. A copy of the notification to all employees on-site about **all** residual PCBs remaining in the SMUD headquarters building.

3. **Operation and Maintenance Plan.** SMUD shall submit an operations and maintenance plan for the installation and maintenance of the cap, and the soil sampling plan to ensure the sealants left in place for concrete aggregate panels is not becoming the source for re-contaminating soils surrounding SMUD headquarters.

4. **PCB Clean Up Completion Report.** Within 60 days after SMUD completes cleanup verification sampling at the site, SMUD must submit a PCB cleanup report for the USEPA approval under 40 CFR 761.61(c) that includes all relevant data and justifications demonstrating that SMUD achieved the USEPA approved Cleanup levels. SMUD must provide the USEPA a report of all remaining PCB concentrations left at the site and address all reporting requirements in 40 CFR 761.61(a)(9) and 40 CFR 761.125(c)(5).

This Approval does not relieve the owner, Sacramento Municipal Utility District from complying with all other applicable federal, state, and local regulations and permits. Departure from the conditions of the Approval without prior written permission from USEPA may result in the commencement of proceedings to revoke this Approval, and/or an enforcement action. Nothing in this Approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this Approval.

This approval only applies to SMUD located at 6201 S Street Sacramento, California. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the site if new information during additional site characterization, cleanup verification, and/or during future post-cleanup activities (e.g., redevelopment and post redevelopment) at the property shows that PCBs remain at the site above the approved PCB cleanup level. In addition, USEPA may require cleanup in areas immediately adjacent to the site if those areas are found to be impacted by PCBs from the site.

USEPA appreciates the opportunity to assist SMUD on the PCB cleanup to be conducted at their facility in Sacramento, California. If you have any questions regarding this Approval please contact George Randell at 415.972.3439. Thank you for your cooperation.

Sincerely,

Jeff Scott, Director
Waste Management Division

Cc Via Electronic Mail Only

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